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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

DEBORAH GETZ, et al.,

Plaintiffs,

v.

THE BOEING COMPANY, et al.,

Defendant.

Case No. CV 07-6396 CW (MEJ)

**JOINDER OF DEFENDANT THE BOEING
COMPANY TO DEFENDANT HONEYWELL
INTERNATIONAL INC.'S MOTION FOR
PROTECTIVE ORDER; DECLARATION OF
CHUNG H. HAN**

Date: June 19, 2008 (original hearing date prior
to being assigned to Magistrate Judge James)
Time: 10:00 a.m.
Courtroom: B, 15th Floor
Judge: Hon. Maria-Elena James

TO THE HONORABLE COURT, ALL INTERESTED PARTIES AND THEIR
ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that defendant The Boeing Company ("Boeing") hereby joins
in defendant Honeywell International Inc.'s ("Honeywell") motion for protective order, and
incorporates herein such motion and supporting papers by reference. Honeywell's motion for

1 protective order was for the limited purpose of staying its responses to Plaintiffs' Requests for
2 Admission until after Honeywell's pending motions, including a motion to dismiss the complaint,
3 in which all defendants joined, was resolved.

4 Honeywell's motion was originally set for June 19, 2008, at 2:00 p.m. before the
5 Honorable Claudia Wilken. On May 7, 2008, Judge Wilken vacated the original hearing date,
6 and referred the motion, and all further discovery motions, to a Magistrate Judge, the Honorable
7 Maria-Elena James. As of the date of this filing, a new hearing date and time has not been set by
8 Judge James. In an abundance of caution, Boeing files this joinder to be timely with the
9 originally set hearing date.

10 Pursuant to Fed. R. Civ. P. 26(c)(1), Boeing certifies that on May 14, 2008, Chung H. Han
11 and Beth M. Strosky, counsel for Boeing, conferred with Mr. Thomas J. Brandi, counsel for
12 Plaintiffs, in a good faith effort to resolve this dispute without Court action. (*See* Declaration of
13 Chung H. Han, attached hereto, ¶¶ 2.) Mr. Brandi stated that he would not agree to extend or stay
14 Boeing's responses to Plaintiffs' Requests for Admissions until after defendants' motion to
15 dismiss was resolved. (*Id.*)

16 DATED: May 14, 2008

PERKINS COIE LLP

18 By: /s/ Chung H. Han
19 Chung H. Han
20 Attorneys for Defendant
21 The Boeing Company
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DECLARATION OF CHUNG H. HAN

I, Chung H. Han, declare as follows:

1. I am a member in good standing of the State Bar of California and am licensed to practice before all of the Courts of the State of California, including all the federal district courts and the Ninth Circuit Court of Appeals. I am an attorney at the law firm of Perkins Coie LLP, counsel for defendant The Boeing Company ("Boeing") in the within action. I submit this declaration in support of Boeing's Joinder to Honeywell International Inc.'s ("Honeywell") motion for protective order. Except as otherwise stated, I have personal knowledge of the facts set forth herein, and if called upon to do so, I could and would testify thereto based on such personal knowledge.

2. In the afternoon of May 14, 2008, I called Mr. Thomas J. Brandi, Plaintiffs' counsel, to discuss Boeing's joinder to Honeywell's motion. Beth M. Strosky, another of Boeing's attorneys, also participated in the telephone call. Ms. Strosky and I asked Mr. Brandi whether he would agree to extend or stay Boeing's responses to Plaintiffs' Requests for Admissions (currently due May 27, 2008) until after Honeywell's motion to dismiss Plaintiffs' complaint, in which all defendants joined, was resolved. Mr. Brandi stated that he would not extend or stay the pending discovery, and that our conversation fulfilled Boeing's responsibility under the Federal Rules of Civil Procedure to allow Boeing to file its joinder to Honeywell's motion.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on May 14, 2008, at Santa Monica, California.

/s/ Chung H. Han
Chung H. Han